

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FEDERATED LIFE INSURANCE  
COMPANY,

Plaintiff,

VS.

DAMON JOANIS; and ELIZABETH PABEN, as Personal Representative for the Estate of Elenya Herring,

## Defendants

No. 2:23-cv-01726 RSM

**STIPULATION AND ORDER TO  
BRIEFLY EXTEND DEADLINE FOR  
DEFENDANT DAMON JOANIS TO  
ANSWER THE COMPLAINT AND  
ASSERT COUNTERCLAIMS**

**NOTE ON MOTION CALENDAR:  
MARCH 18, 2024**

Pursuant to Western District of Washington Local Civil Rule 10(g), Plaintiff Federated Life Insurance Company and Defendant Damon Joanis, through their undersigned attorneys, stipulate and move as follows:

## I. STIPULATION

Plaintiff Federated Life Insurance Company and Defendant Damon Joanis, hereby stipulate and agree to extend the time for Defendant Joanis to file his Answer and Counterclaims to Federated Life Insurance Company's First Amended Complaint to March 20, 2024.

DATED this 18th day of March 2024.

## LETHER LAW GROUP

/s/ Kevin J. Kay

Kevin J. Kay, WSBA #34546  
1848 Westlake Avenue N, Suite 100  
Seattle, WA 98109  
P: (206) 467-5444/F: (206) 467-5544

STIPULATION AND ORDER  
EXTENDING TIME TO ANSWER – 1  
2:23-cv-01726-MLP

LETHER LAW GROUP  
1848 WESTLAKE AVENUE N, SUITE 100  
SEATTLE, WA 98109  
P: (206) 467-5444 F: (206) 467-5544

1 kkay@letherlaw.com  
2 *Counsel for Defendant Damon Joanis*

3 BULLIVANT HOUSER BAILEY PC

4 /s/ Matthew J. Sekits  
5 Matthew J. Sekits, WSBA #26175  
6 925 Fourth Avenue, Suite 3800  
7 Seattle, WA 98104  
8 direct 206.521.6452 / main 206.292.8930  
9 matthew.sekits@bullivant.com  
10 *Counsel for Plaintiff Federated Life Insurance*  
11 *Company*

1 ORDER  
2  
3

4 IT IS SO ORDERED.  
5  
6

7 DATED this 25<sup>th</sup> day of March, 2024.  
8  
9

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
  
RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

Presented by:

LETHER LAW GROUP

/s/ Kevin J. Kay  
Kevin J. Kay, WSBA #34546  
1848 Westlake Avenue N, Suite 100  
Seattle, WA 98109  
P: (206) 467-5444/F: (206) 467-5544  
kkay@letherlaw.com  
*Counsel for Defendant Damon Joanis*

BULLIVANT Houser Bailey PC

/s/ Matthew J. Sekits  
Matthew J. Sekits, WSBA #26175  
925 Fourth Avenue, Suite 3800  
Seattle, WA 98104  
direct 206.521.6452 / main 206.292.8930  
matthew.sekits@bullivant.com  
*Counsel for Plaintiff Federated Life Insurance Company*

## CERTIFICATE OF SERVICE

The undersigned hereby certifies under the penalty of perjury under the laws of the United States of America that on this date I caused to be served in the manner noted below a true and correct copy of the foregoing on the parties mentioned below as indicated:

Matthew J. Sekits  
Pamela DeVet  
Bullivant Houser Bailey PC  
925 Fourth Avenue Suite 3800  
Seattle, WA 98104  
[matthew.sekits@bullivant.com](mailto:matthew.sekits@bullivant.com)  
[pamel.devet@bullivant.com](mailto:pamel.devet@bullivant.com)

Hamilton H Gardiner  
Holmquist & Gardiner PLLC  
1000 Second avenue Suite 1770  
Seattle, WA 98122  
P: (206) 438-9083/ F: (206) 694-4601  
hamilton@lawhg.net

**By:**  **First Class Mail**  **ECF/Email**  **Legal Messenger**

Dated this 18th day of March 2024 at Seattle, Washington.

/s/ Brittany Lang  
Brittany Lang | Paralegal

STIPULATION AND ORDER  
EXTENDING TIME TO ANSWER – 4  
2:23-cv-01726-MLP

LETHER LAW GROUP  
1848 WESTLAKE AVENUE N, SUITE 100  
SEATTLE, WA 98109  
P: (206) 467-5444 F: (206) 467-5544